

FILED
U.S. DISTRICT COURT
DISTRICT OF MASS.

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U.S. DISTRICT COURT
DISTRICT OF MASS.

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DEBORAH CHIN, Individually and On Behalf)	Civil Action No. 04-CV-10294-DPW
of All Others Similarly Situated,)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., et al.,)
)
Defendants.)
)
_____)
MICHELLE TREBITSCH, On Behalf of	Civil Action No. 04-CV-10307-DPW
Herself and All Others Similarly Situated,)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., et al.,)
)
Defendants.)
)
_____)

[Caption continued on following page.]

GLOBAL UNDERVALUED SECURITIES MASTER FUND'S NOTICE OF MOTION AND
MOTION TO CONSOLIDATE CASES FOR ALL PURPOSES AND FOR AN ORDER
REQUIRING PRESERVATION OF DOCUMENTS

INFORMATION DYNAMICS, LLC, On
Behalf of Itself and All Others Similarly
Situating,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10308-DPW

) CLASS ACTION

PETER KALTMAN, On Behalf of Himself
and All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10309-DPW

) CLASS ACTION

SAMANTHA DEN, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10310-DPW

) CLASS ACTION

[Caption continued on following page.]

RICHARD CURTIS, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10314-MLW

) CLASS ACTION

RONALD KASSOVER, On Behalf of the
Ronald Kassover IRA and All Others Similarly
Situating,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10329-DPW

) CLASS ACTION

STEVE L. BAKER, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10333-DPW

) CLASS ACTION

[Caption continued on following page.]

MICHAEL KAFFEE, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10345-DPW
)
)

) CLASS ACTION
)
)

HAIMING HU, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10346-DPW
)
)

) CLASS ACTION
)
)

CHARLES STARBUCK, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10362-DPW
)
)

) CLASS ACTION
)
)

[Caption continued on following page.]

SAMUEL HO, Individually and On Behalf of) Civil Action No. 04-CV-10363-DPW
All Others Similarly Situated,)
) CLASS ACTION
Plaintiff,)

vs.)

SONUS NETWORKS, INC., et al.,)
)
Defendants.)

JEFFREY C. RODRIGUES, Individually and) Civil Action No. 04-CV-10364-DPW
On Behalf of All Others Similarly Situated,)
) CLASS ACTION
Plaintiff,)

vs.)

SONUS NETWORKS, INC., et al.,)
)
Defendants.)

ROBERT CONTE and MARK RESPLER,) Civil Action No. 04-CV-10382-DPW
Themselves and On Behalf of All Others)
Similarly Situated,) CLASS ACTION

Plaintiffs,)

vs.)

SONUS NETWORKS, INC., et al.,)
)
Defendants.)

[Caption continued on following page.]

**WHEATON ELECTRICAL SERVICES
RETIREMENT 401K PROFIT SHARING
PLAN, On Behalf of Itself and All Others
Similarly Situated,**

Plaintiff,

VS.

SONUS NETWORKS, INC., et al.,

Defendants.

Civil Action No. 04-CV-10383-DPW

CLASS ACTION

BRIAN CLARK, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

VS.

SONUS NETWORKS, INC., et al.,

Defendants.

Civil Action No. 04-CV-10454-DPW

CLASS ACTION

SHEILA BROWNELL, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

VS.

SONUS NETWORKS, INC., et al.,

Defendants.

Civil Action No. 04-CV-10597-DPW

CLASS ACTION

[Caption continued on following page.]

SAVERIO PUGLIESE, On Behalf of Himself) Civil Action No. 04-CV-10612-DPW
and All Others Similarly Situated,)

Plaintiff,)

vs.)

SONUS NETWORKS, INC., et al.,)

Defendants.)

DAVID V. NOCITO, On Behalf of Himself) Civil Action No. 04-CV-10623-DPW
and All Others Similarly Situated,)

Plaintiff,)

vs.)

SONUS NETWORKS, INC., et al.,)

Defendants.)

CLASS ACTION

CLASS ACTION

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

Global Undervalued Securities Master Fund ("Global Securities") will and hereby does move, pursuant to Rule 42 of the Federal Rules of Civil Procedure, to consolidate for all purposes the above-captioned 19 related actions and for an order regarding the preservation of documents. The basis for the motion is that the 19 related actions are virtually identical and raise common questions of fact and law. The motion is based on this notice of motion, the memorandum of points and authorities filed herewith, the files and records in each of these 19 related cases, and such other matters or arguments that the Court may consider at the hearing on this motion.

DATED: April 12, 2004

MELICK, PORTER & SHEA, LLP
RICHARD J. SHEA (BBO 456310)
JOHN E. DeWICK (BBO 654723)

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document
was served upon the attorney of record for each party by
mail on 4/12/04





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[Proposed] Lead Counsel for Plaintiffs

DECLARATION OF SERVICE BY MAIL

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and a resident of the County of San Diego, over the age of 18 years, and not a party to or interest in the within action; that declarant's business address is 401 B Street, Suite 1700, San Diego, California 92101.

2. That on April 12, 2004, declarant served the GLOBAL UNDERVALUED SECURITIES MASTER FUND'S NOTICE OF MOTION AND MOTION TO CONSOLIDATE CASES FOR ALL PURPOSES AND FOR AN ORDER REQUIRING PRESERVATION OF DOCUMENTS by depositing a true copy thereof in a United States mailbox at San Diego, California in a sealed envelope with postage thereon fully prepaid and addressed to the parties listed on the attached Service List.

3. That there is a regular communication by mail between the place of mailing and the places so addressed.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 12th day of April, 2004, at San Diego, California.


SHARON E. FORD

SONUS NETWORKS-CA

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